

SULLIVAN & WORCESTER LLP
Michael T. Sullivan (MS 3158)
Karin Klapper Orenstein (KO 1274)
1290 Avenue of the Americas, 29th Floor
New York, New York 10104
(212) 660-3000

Attorneys for Defendant
T.C. Ziraat Bankasi A.S.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
THERESA GUIRLANDO,	:
	:
Plaintiff,	:
	:
- against -	:
	:
T.C. ZIRAAT BANKASI A.Ş.	:
	:
Defendant.	:
-----X	

07 Civ. 10266 (RJS)

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT, upon the Memorandum of Law and supporting declarations submitted herein, defendant T.C. Ziraat Banksasi A.Ş, by its undersigned counsel, Sullivan & Worcester LLP, will move this Court before the Honorable Richard J. Sullivan, United State District Judge in Courtroom 21C of the United States Courthouse located at 500 Pearl Street, New York, New York for an Order dismissing this action under the doctrine of forum non conveniens, pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(2) for lack of subject-matter and personal jurisdiction, and pursuant to Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim. Defendants respectfully request oral argument on this motion on a date and at a time designated by the Court.

DATED: New York, New York
February 11, 2008

SULLIVAN & WORCESTER LLP

By: s/Michael T. Sullivan
Michael T. Sullivan (MS 3158)
Karin Klapper Orenstein (KO 1274)

1290 Avenue of the Americas, 29th Floor
New York, New York 10104
Tel.: (212) 660-3000
Fax: (212) 660-3001
Counsel for Defendant